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12	Attorneys for Mitsubishi Electric Corporation, Mitsubishi Electric US, Inc., and Mitsubishi Electric Visual Solutions America, Inc.	
13	and Musuoism Lieethe visual Solutions America, me.	
	IN THE UNITED STATES DISTRICT COURT	
14	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
15	FOR THE NORTHERN DI	STRICT OF CALIFORNIA
	SAN FRANCIS	SCO DIVISION
16		
17		M . F'I N 207 05044.5G
10	In re: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION	Master File No. 3:07-cv-05944-SC
18	ANTITRUST LITIGATION	MDL No. 1917
19	This Document Relates to:	1,22,2,1,0,1,1,1,1
20		DECLARATION OF SHAUN M. VAN
20	ViewSonic Corporation v. Chunghwa Picture Tubes, Ltd., No. 14-cv-02510	HORN IN SUPPORT OF
21		DEFENDANTS' JOINT MOTION FOR
22		SUMMARY JUDGMENT AGAINST VIEWSONIC CORPORATION BASED
		UPON FAILURE TO PROVIDE
23		SUFFICIENT EVIDENCE TO AVOID
24		FTAIA BAR ON FOREIGN
		COMMERCE.
25		Judge: Hon. Samuel P. Conti
26		Court: Courtroom 1, 17th Floor Date and Time: Feb. 6, 2015 at 10 a.m.
		Date and Time. Peo. 0, 2013 at 10 a.m.
27		_

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DECLARATION OF SHAUN M. VAN HORN

I, SHAUN VAN HORN, declare as follows:

- 1. I am an attorney licensed to practice law in the State of Illinois, I am an attorney at the law firm of Jenner & Block LLP, and an attorney of record for Defendants Mitsubishi Electric Corporation, Mitsubishi Electric US, Inc., and Mitsubishi Electric Visual Solutions America, Inc. I submit this declaration in support of Defendants' Notice Of Motion And Joint Motion For Summary Judgment Against ViewSonic Corporation Based Upon Failure To Provide Evidence To Avoid FTAIA Bar On Foreign Commerce. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently to such facts under oath.
- 2. **[UNDER SEAL**] Attached to my declaration as **Exhibit 1** is a true and correct copy of the ViewSonic Complaint.
- 3. **[UNDER SEAL]** Attached to my declaration as **Exhibit 2** is a true and correct copy of the VIEW_CRT00041325.
- 4. **[UNDER SEAL]** Attached to my declaration as **Exhibit 3** is a true and correct copy of the Deposition Transcript of Bonny Cheng, ViewSonic's 30(b)(6) witness.
- 5. **[PUBLIC]** Attached to my declaration as **Exhibit 4** is a true and correct copy of http://www.viewsonic.com/us/company/executive/james-chu.
- 6. **[UNDER SEAL]** Attached to my declaration as **Exhibit 5** is a true and correct copy of the Deposition Transcript of Rose Yang.
- 7. [UNDER SEAL] Attached to my declaration as Exhibit 6 is a true and correct copy of VIEW_CRT00000002.
- 8. **[UNDER SEAL]** Attached to my declaration as **Exhibit 7** is a true and correct copy the Panasonic Defendants' Letter to ViewSonic on November 12, 2014.
- 9. [PUBLIC] Attached to my declaration as Exhibit 8 is a true and correct copy of a letter from ViewSonic to the Panasonic Defendants on November 13, 2014.

- 10. **[PUBLIC]** Attached to my declaration as **Exhibit 9** is a true and correct copy of an email from A. Heaven to K. Goldstein on November 13, 2014.
- 11. **[UNDER SEAL**] Attached to my declaration as **Exhibit 10** is a true and correct copy of VIEW_CRT00041042.
- 12. **[UNDER SEAL**] Attached to my declaration as **Exhibit 11** is a true and correct copy of VIEW_CRT00041130.
- 13. **[UNDER SEAL**] Attached to my declaration as **Exhibit 12** is a true and correct copy of ViewSonic's Expert Report of Alan Frankel, served on June 9, 2014.
- 14. **[UNDER SEAL]** Attached to my declaration as **Exhibit 13** is a true and correct copy of the Deposition Transcript of Vincent Sampietro, Sharp's 30(b)(6) witness.
- 15. **[UNDER SEAL**] Attached to my declaration as **Exhibit 14** is a true and correct copy of SHARP-CRT-00000129-SHARP-CRT-00000130, SHARP-CRT-00000140-SHARP-CRT-00000141, SHARP-CRT-00025161, SHARP-CRT-00073859-SHARP-CRT-00073895.
- 16. I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed this 14th day of November, 2014 at Chicago, Illinois.

/s/ Shaun M. Van Horn____

Shaun M. Van Horn